

**UNITED STATES BANKRUPTCY COURT, NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

RE: KAILA J FLEMING

) Case No. 19 B 01273  
)  
Debtor ) Chapter 13  
)  
 ) Judge: JACK B SCHMETTERER

**NOTICE OF MOTION**

KAILA J FLEMING

435 W 66TH ST #1W  
CHICAGO, IL 60621

DAVID M SIEGEL  
via Clerk's ECF noticing procedures

Please take notice that on April 10, 2019 at 11:00 am my designee or I will appear before the Honorable Judge JACK B SCHMETTERER at 219 South Dearborn Courtroom 682, Chicago, IL and present the motion set forth below.

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail at 55 E Monroe St., Chicago, IL or by the methods indicated on March 14, 2019.

/s/ Tom Vaughn

**TRUSTEE'S MOTION TO DISMISS FOR UNREASONABLE DELAY**

Now comes Tom Vaughn, Trustee in the above entitled case and moves the Court to dismiss this case in support thereof states:

1. On January 16, 2019 the Debtor filed a petition and plan under Chapter 13 of Title 11 U.S.C.
2. That the above-captioned plan has not yet been confirmed .
3. That the Debtor has caused unreasonable delay that is prejudicial to creditors by failing to:

Amend plan to insert tax refund language and to increase the adequate protection payments to at least \$80 and to provide proof of contribution.

WHEREFORE, the Trustee prays that this case be dismissed for unreasonable delay by the debtor pursuant to 11 U.S.C. § 1307 (c) (1).

Respectfully submitted,

TOM VAUGHN  
CHAPTER 13 TRUSTEE  
55 E. Monroe Street, Suite 3850  
Chicago, IL 60603  
(312) 294-5900

/s/ Tom Vaughn